

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE JOHNSON & JOHNSON

TALCUM POWDER PRODUCTS

MARKETING, SALES PRACTICES,

AND PRODUCTS LIABILITY

LITIGATION

MDL NO. 16-2738 (FLW) (LHG)

**SECOND SUPPLEMENT TO THE JANUARY 31, 2018
AGREED ORDER AND STIPULATION REGARDING THE JOHNSON &
JOHNSON DEFENDANTS' PRODUCTION OF TALCUM POWDER
PRODUCTS AND TALC SAMPLES**

WHEREAS, plaintiffs in the above-captioned action as well as other actions in which plaintiffs have made personal injury claims regarding Johnson's® Baby Powder or Shower to Shower® cosmetic talc products sold in the United States ("JBP" and "STS," respectively; the above-referenced lawsuits hereinafter referred to as "Talcum Powder Litigation")¹ have requested that defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (collectively, "defendants") produce for inspection certain transmission electron microscopy ("TEM") grids of JBP, STS or the talc used for those products;

¹ “Talcum Powder Litigation” shall refer only to litigation involving Johnson & Johnson and/or Johnson & Johnson Consumer Inc.

WHEREAS, defendants represent that they have conducted reasonable searches for and do not possess any TEM grids of JBP, STS or the talc used for those products;

WHEREAS, defendants represent that they have made reasonable inquiries and have a reasonable and good faith belief that McCrone Associates does not possess any TEM grids of JBP, STS or the talc used for those products;

WHEREAS, defendants represent that they have identified TEM grids of JBP, STS and the talc used for those products, as well as TEM grids of samples collected from deposits used to source talc for JBP and/or STS (“Deposit Samples”), that are in the possession of RJ Lee Group, Inc. (“RJLG”) or Alan Segrave (“Segrave”)² and that were either (1) analyzed by RJLG or Segrave for defendants in the ordinary course of their business or (2) analyzed by RJLG or Segrave and relied on by defendants and/or their expert(s) in connection with Talcum Powder Litigation (collectively, “TEM Grids”);

² Alan Segrave resigned from Bureau Veritas Laboratories (“BV”) on or about June 17, 2020. Herein, all references to Segrave shall include BV.

WHEREAS, defendants represent that they have made reasonable efforts to create inventories of the samples used to create these TEM Grids, which they provided to plaintiffs and which are attached hereto as Exhibits A and B;³

WHEREAS, defendants represent that TEM Grids are not within their possession, custody or control but that they will facilitate plaintiffs' inspection of TEM Grids in coordination with RJLG and/or Segrave pursuant to the terms of this Second Supplement to the January 31, 2018 Agreed Order and Stipulation Regarding the Johnson & Johnson Defendants' Production of Talcum Powder Products and Talc Samples ("Second Supplement to the Agreed Order");

WHEREAS, there are thousands of plaintiffs involved in Talcum Powder Litigation against defendants and a limited, finite number of TEM Grids, which defendants represent are fragile and could be damaged while handling or inspecting them, microscopically or otherwise;

WHEREAS, it is plaintiffs' position that it is generally accepted that a laboratory can examine a TEM grid prepared in another laboratory, and this practice is routinely engaged in outside of litigation; that evaluation by another

³ Defendants' disclosure of TEM grids does not include those, if any, prepared by consulting witnesses other than RJLG and Segrave. Defendants represent that such consultants' grids, if any, are made solely from samples available to plaintiffs (e.g., Samples, as defined in the Agreed Order, talc or talcum powder produced by plaintiffs or their counsel in Talcum Powder Litigation, talcum powder purchased in the marketplace, etc.).

laboratory can be done reliably when documentation of the quality of the TEM grids is obtained prior to shipping and upon receipt of the TEM grids by the laboratories involved in the exchange; and that the process of inspecting the TEM grids generally does not cause damage to them when proper safeguards are followed; but that it is also recognized that grid openings can become damaged if the TEM grids are disturbed by handlers or during evaluation if an electron beam in the transmission electron microscope is too intense or remains on the grid opening for a substantial period of time;

WHEREAS, although defendants have objected to the production of TEM grids on a number of grounds including relevance, burden and risk of damage to the TEM grids, they have agreed to this Second Supplement to the Agreed Order by way of compromise, as a means of addressing some of their objections and accounting for some of the logistical difficulties associated with in-person inspections during the COVID-19 pandemic. This compromise is without waiver of defendants' objections and right to seek modifications to the provisions set forth herein, as public health circumstances evolve;

WHEREAS, defendants have agreed to this compromise on the condition that plaintiffs will make certain TEM grids analyzed by their experts available to defendants for inspection pursuant to the same terms and procedures set forth herein;

WHEREAS, the parties have met and conferred to discuss mutually agreeable procedures to document the quality and condition of TEM grids before and after they are transferred to another laboratory, as well as to minimize the risk of damage to TEM grids during re-inspection by the other party's expert(s).

IT IS THEREFORE AGREED AND ORDERED THAT the parties will comply with this Second Supplement to the Agreed Order with respect to requests for the inspection of any TEM grids; and

IT IS FURTHER AGREED AND ORDERED THAT damage to or the destruction of any TEM grid resulting from compliance with this Second Supplement to the Agreed Order, including the production, transfer, inspection or any other aspect of handling the TEM grids that is necessitated by this Second Supplement to the Agreed Order, does not constitute spoliation of evidence.

IT IS FURTHER AGREED AND ORDERED AS FOLLOWS:

1. TEM grids discussed in this Second Supplement to the Agreed Order are subject to the representations, qualifications, provisions, conditions and definitions of the Agreed Order, except as otherwise stated herein.

2. Immediately following the entry of this Second Supplement to the Agreed Order, plaintiffs will select and identify to defendants in writing twenty

(20) samples⁴ or an agreed upon number from Exhibits A and B. Additionally, defendants shall have thirty (30) business days from the entry of this Second Supplement to the Agreed Order to select and identify to plaintiffs in writing twenty (20) samples or an agreed upon number from those described in paragraph 19. (TEM grids corresponding to the samples selected and agreed to by the parties and/or ordered for inspection by any court are hereinafter referred to as “Selected Grids.”)

3. If any dispute arises in connection with the selection or transfer of TEM grids, the parties shall meet and confer within five (5) business days of the objection in an effort to resolve the parties’ dispute. If the dispute cannot be resolved by agreement, the parties shall present the dispute to the MDL Court initially by letter, consistent with Local Civil Rule 37.1(a)(1), before filing a formal motion for an order.

4. Within ten (10) days of final resolution of such objection(s), or within ten (10) days of each party’s selection if no objection is asserted, the responsible party shall cause the Selected Grids to be delivered to a laboratory chosen by the Selecting Party (“Selecting Party’s Laboratory”). Except for returning the Selected

⁴ RJLG and Segrave generally analyze 2 TEM grids for each sample they examine. In addition, for each TEM grid analyzed, RJLG and Segrave generally create additional TEM grids of the same sample that are not analyzed. As to any sample selected for inspection, plaintiffs shall receive all TEM grids associated with that sample that were analyzed by RJLG or Segrave.

Grids to the laboratory of origin, the Selecting Party's Laboratory shall not transfer the Selected Grids to any other laboratory unless agreed upon by the parties and subject to the procedures outlined in this protocol.

5. Prior to transferring the Selected Grids to the Selecting Party's Laboratory, the laboratory of origin shall take photomicrographs of each of the Selected Grids at magnifications and in such number that are sufficient to capture the quality and condition of the Selected Grids before they are transferred to the Selecting Party's Laboratory. Such photomicrographs shall be emailed to the Selecting Party before the Selected Grids are transferred to the Selecting Party's Laboratory.

6. The Selected Grids shall be packaged by the laboratory of origin in a manner to allow their safe transfer to the Selecting Party's Laboratory and shall be transferred to the Selecting Party's Laboratory by means agreed to by the parties.

7. The Selecting Party shall take all reasonable steps to minimize the risk of damage to the Selected Grids that have been sent to the Selecting Party's Laboratory while they are in the possession of the Selecting Party's Laboratory and in connection with returning the Selected Grids to the laboratory of origin.

8. Within a reasonable time of receiving the Selected Grids, the Selecting Party's Laboratory shall take photomicrographs of each of the Selected Grids to capture the quality and condition of the Selected Grids upon their receipt

by the Selecting Party's Laboratory and in such manner that the photomicrographs may be compared to those taken by the laboratory of origin pursuant to paragraph 5. Such photomicrographs shall be emailed to the non-Selecting Party prior to the inspection of the Selected Grids at the Selecting Party's Laboratory.

9. Inspection of the Selected Grids shall take place at the Selecting Party's Laboratory. The Selecting Party's expert(s) may inspect the Selected Grids via light microscopy, scanning electron microscopy and/or ATEM.⁵ The Selecting Party's testifying expert(s) will create and maintain count sheets and document each structure they identify and in which grid opening the structure was located. All photographs taken of a structure, if any, and all images and data collected using energy dispersive spectroscopy or selected area electron diffraction, if any, shall be maintained and produced to the non-Selecting Party, along with all count sheets and other documentation of the analysis.

10. The Selecting Party's expert(s) will use best efforts to ensure that the Selected Grids are not damaged or destroyed during analysis. If damage to a Selected Grid is identified at any point while in the possession of the Selecting Party's Laboratory, including during analysis, such damage shall be documented, including the date and time it was observed, photomicrographs of such damage

⁵ The parties reserve their right to object to the relevance and/or admissibility of any test result(s) obtained pursuant to the testing described herein.

shall be taken, and the inspection of all Selected Grids shall be suspended until the parties have agreed upon an appropriate way of proceeding under the circumstances. Any disputes regarding the continued inspection of any Selected Grid shall be handled pursuant to the procedures set forth in paragraph 3.⁶

11. The inspection of the Selected Grids may be recorded by video. To the extent a video recording is made, it is for the limited purpose of capturing the handling of the Selected Grids so that such a recording exists if a claim is later made that the Selected Grids were damaged during the inspection. Nothing in this paragraph shall foreclose a party from seeking to show such recording to a jury or the opposing party from objecting and seeking to prevent the admission of the recording at trial.

12. The Selecting Party's Laboratory shall return the Selected Grids to the laboratory of origin within sixty (60) business days of receipt, unless a longer or shorter period is believed to be necessary, taking into account court deadlines, the number of TEM grids to be inspected and such other factors as may reasonably warrant a longer or shorter period. To the extent a longer or shorter period is

⁶ The parties reserve their right to object to the admissibility of testing data collected for any grid opening or particle that was not examined prior to an inspection conducted pursuant to this Second Supplement to the Agreed Order if the testing results cannot be replicated and/or the opposing party does not have an opportunity to rebut them because of damage to the Selected Grid.

required, the parties shall meet and confer and resolve any disputes pursuant to the procedures set forth in paragraph 3.

13. Absent unforeseen circumstances, the Selected Grids shall be returned using the same containers in which they were received and sent in the same or comparable manner used for delivery to the Selecting Party's Laboratory. To the extent that an alternative manner of packaging and/or delivering the Selected Grids to the laboratory of origin is believed to be necessary, the parties shall meet and confer and resolve any disputes pursuant to the procedures set forth in paragraph 3.

14. Following their inspection and prior to returning the Selected Grids, the Selecting Party's Laboratory shall take photomicrographs of each of the Selected Grids to capture the quality and condition of the Selected Grids prior to their return and in such manner that the photomicrographs may be compared to those taken by the laboratory of origin pursuant to paragraph 5. If a dispute arises, such photomicrographs shall be emailed to the non-Selecting Party within a reasonable time of returning the Selected Grids to the laboratory of origin.

15. Within a reasonable time of receiving the Selected Grids, the laboratory of origin shall take photomicrographs of each of the Selected Grids to capture the quality and condition of the Selected Grids upon their return to the laboratory of origin and in such manner that the photomicrographs may be compared to those taken by the laboratory of origin pursuant to paragraph 5. If a

dispute arises, such photomicrographs shall be emailed to the Selecting Party within a reasonable time of receiving the Selected Grids.

16. The parties and/or their experts shall maintain a chain of custody for the Selected Samples using the form attached hereto as Exhibit C.

17. The inspection of additional TEM grids may be requested in increments not to exceed ten (10) samples or a reasonable number agreed to by the parties. The non-Selecting Party may object to the Selecting Party's request, including to the continued inspection of TEM grids. The parties shall meet and confer within five (5) business days of the non-Selecting Party's objection(s) if any is asserted. Any unresolved dispute(s) shall be addressed to the MDL Court pursuant to the procedures set forth in paragraph 3. The parties shall comply with this Second Supplement to the Agreed Order to the extent that any additional inspections are agreed to by the parties or ordered by this Court.

18. Nothing herein shall limit either party's right to inspect the TEM grids of its own experts at any time.

19. Plaintiffs will make certain TEM grids analyzed by their testifying experts available to defendants for inspection pursuant to the terms and procedures set forth herein, specifically, TEM grids created from any talc sample (a) analyzed by defendants in the ordinary course of their business, (b) produced by defendants pursuant to the Agreed Order or Supplement to the Agreed Order (Dkt. No. 10981-

1), (c) produced by co-defendant Imerys pursuant to the Agreed Order and Stipulation Regarding Production of Talc Samples from Imerys Talc America Inc. (Dkt. No. 4757), (d) analyzed by an expert for plaintiffs in connection with the samples listed in footnote 7,⁷ or (e) otherwise specifically agreed to by the parties.⁸

20. If the parties agree that additional TEM grids shall become the subject of this Second Supplement to the Agreed Order, they will supplement this Order with an inventory of the samples corresponding to such additional TEM grids. If the parties disagree as to the inclusion of such TEM grids, they shall meet and confer and address any unresolved disputes to the MDL Court pursuant to the procedures set forth in paragraph 3.

⁷ MAS Sample Nos. M65205-001, M67341-001, M67341-005, M67341-006, M67341-007, M67341-008, M67341-009, M67341-010, M67341-011, M67341-012, M68705-005, M68705-006, M68705-007, M68705-008, M68705-009, M68705-010, M68705-011, M68705-012, M68705-013, M68705-014, M68706-001, M68706-002, M68706-003, M68706-004, M68707-001, M68707-002, M68707-003, M68707-004, M70523-005, M70523-006, M70523-007, M70523-008, M70523-009, M70523-010, M70523-011, M70523-012, M70523-013, M70523-014, M70523-018, M70523-019, M70524-001, M70524-002, M70524-003, M70524-004, M70525-001, M70525-002, M70525-003 and M70525-004.

⁸ Defendants disagree as to the scope of TEM grids examined by plaintiffs' testifying experts that should be the subject of this Second Supplement to the Agreed Order and will continue to meet and confer with plaintiffs and raise any issues that cannot be resolved between the parties with the Court.

SO ORDERED, this 4th day of March, 2021.

/s/ Freda L. Wolfson

United States Chief District Judge

STIPULATED AND AGREED:

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EXHIBIT A

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Inventory of Samples for Which TEM Grids Were Created and Analyzed by RJ Lee Group¹

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
1.	3136108	#1	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Talc Mine Face
2.	3136109	#2	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Talc Mine Face
3.	3136110	#3	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Mica Schist in Contact with Talc
4.	3136111	#4	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Grey Talc (Grigio)
5.	3136112	#5	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Talc and Chlorite at Mine Face
6.	3136113	#6	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Talc Active Mine Face
7.	3136114	#7	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Marble Waste Sorting Station
8.	3136115	#8	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Marble Waste Sorting Station
9.	3136116	#9	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Talc Sorting Station (Bianco)
10.	3136117	#10	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; OMT Sorting Station
11.	3136118	#11	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Grey Talc Sorting (Grigio)
12.	3136119	#12	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Italian Crude
13.	3136120	#13	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Guangxi Crude
14.	3136121	#14	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; French Crude 00
15.	3136122	#15	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; French Crude 000

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
16.	3136123	#16	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Fibrous Mineralization in Gianna
17.	3136124	#17	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Marble Waste in Gianna
18.	3136125	#18	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Mica Schist in Gianna Waste
19.	3136126	#19	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Amphibole Prismatic in Footwall Metabasite
20.	3136127	#20	03/24/2016	Deposit Sample	Lit. – Miscellaneous	Italian Talc Mine Visit; Talc Paola
21.	3138491	1-1Q16	02/19/2016	Milled Talc	OCB – Quarterly Monitoring Program	
22.	3139455	1-2Q16	06/08/2016	Milled Talc	OCB – Quarterly Monitoring Program	
23.	3140762	1-3Q16	09/15/2016	Milled Talc	OCB – Quarterly Monitoring Program	
24.	3141790	1-4Q16	12/02/2016	Milled Talc	OCB – Quarterly Monitoring Program	
25.	3143083	1-1Q17	02/17/2017	Milled Talc	OCB – Quarterly Monitoring Program	
26.	3144312	1-2Q17	06/01/2017	Milled Talc	OCB – Quarterly Monitoring Program	
27.	3145361	1-3Q17	09/29/2017	Milled Talc	OCB – Quarterly Monitoring Program	
28.	3147067	1-4Q17	11/22/2017	Milled Talc	OCB – Quarterly Monitoring Program	
29.	3148949	20180015-01B1	04/07/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample; Jody E. Ratcliff v. American Honda Motor Co. Inc., et al.
30.	3148950	20180015-01B2	04/07/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample; Jody E. Ratcliff v. American Honda Motor Co. Inc., et al.

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
31.	3149010	1-1Q18	02/20/2018	Milled Talc	OCB – Quarterly Monitoring Program	
32.	3149100		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut BB
33.	3149101		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Sample; USA VT Argonaut Underflow
34.	3149102		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut LG
35.	3149103		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut XST
36.	3149104		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut R
37.	3149105		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut G
38.	3149106		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut HG
39.	3149107		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut Serp
40.	3149108		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut CRX
41.	3149109		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut Drill
42.	3149110		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut
43.	3149111		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut BW
44.	3149112		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut MG

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
45.	3149113		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut
46.	3149114		04/06/2018	Deposit Sample	Lit. – Miscellaneous	Mickey Gunter Argonaut Mine Sample; USA VT Argonaut Amp
47.	3149710	JBP001	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
48.	3149711	JBP006	12/11/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
49.	3149713	JBP087	12/31/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
50.	3149714	JBP096	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
51.	3149715	JBP097	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
52.	3149717	JBP107	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
53.	3149718	JBP119	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
54.	3149722	JBP166	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
55.	3149723	JBP167	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
56.	3149724	JBP169	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
57.	3149727	JBP183	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
58.	3149730	JBP232	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
59.	3149731	JBP237	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
60.	3149732	JBP294B	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
61.	3149734	STS001	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
62.	3149735	STS002	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
63.	3149737	STS004	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
64.	3149741	STS013	12/31/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
65.	3149742	STS016	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
66.	3149745	STS021	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
67.	3149748	STS036	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
68.	3149749	STS042	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
69.	3149750	STS043	12/31/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
70.	3149751	STS046	12/31/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
71.	3149752	STS051	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
72.	3149754	STS055	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
73.	3149756	STS065	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
74.	3149757	STS065	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
75.	3149758	2014.001.0145 20180070-35B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
76.	3149759	2014.001.0403 20180070-38B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
77.	3149760	2014.001.0612	12/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
78.	3149762	2014.001.1363	12/27/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
79.	3149765	2014.001.3718	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
80.	3149785	001	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65205-001
81.	3149786	002	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65208-001
82.	3149787	003	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65228-001
83.	3149788	004	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65329-013
84.	3149789	005	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65329-018
85.	3149790	006	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65329-041
86.	3149791	007	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M65329-043
87.	3149794	010	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66173-001
88.	3149795	011	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66173-002
89.	3149796	012	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66173-003
90.	3149797	013	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66203-001
91.	3149801	017	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66203-005
92.	3149802	018	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66203-007
93.	3149803	019	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66309-002
94.	3149804	020	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66309-003

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
95.	3149805	021	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66352-001
96.	3149806	022	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66352-002
97.	3149807	023	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66405-001
98.	3149808	024	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66405-002
99.	3149809	025	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66507-001
100.	3149810	026	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66508-001
101.	3149811	027	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66509-001
102.	3149812	028	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66510-001
103.	3149813	029	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66511-001
104.	3149814	030	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66512-001
105.	3149815	031	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66513-001
106.	3149816	032	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66514-001
107.	3149817	033	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M66515-001
108.	3149819	035	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M68379-001
109.	3149820	036	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M68379-002
110.	3149821	037	04/23/2018	Finished Good	Lit. – Produced by Plaintiffs	MAS Sample; Talc-M68483-001
111.	3150303	1-2Q18	05/17/2018	Milled Talc	OCB – Quarterly Monitoring Program	

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
112.	3150649	STS009	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
113.	3150650	STS014	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
114.	3150651	STS015	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
115.	3150652	STS027	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
116.	3150653	STS029	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
117.	3150654	STS030	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
118.	3150655	STS044	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
119.	3150656	STS049	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
120.	3150657	2014.001.0397	11/04/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
121.	3154141	JBP092	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
122.	3154142	JBP093	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
123.	3154143	JBP110	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
124.	3154144	JBP111	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
125.	3154145	JBP188	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
126.	3154146	JBP209	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
127.	3154147	JBP213	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
128.	3154148	JBP238	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
129.	3154149	JBP241	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
130.	3154150	2014.001.5102	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
131.	3154481	1-3Q18	09/11/2018	Milled Talc	OCB – Quarterly Monitoring Program	
132.	3154678	2014.001.0499	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
133.	3154679	2014.001.2021	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
134.	3154680	2014.001.3918	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
135.	3154681	2014.001.3921	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
136.	3154682	2014.001.5859	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
137.	3154683	JBP004	11/12/2018	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
138.	3155522	2014.001.0939 20180070-13B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
139.	3155525	2014.001.2462 20180070-19B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
140.	3155526	2014.001.3976 20180070-30B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
141.	3155527	2015.001.3448 20180070-80B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
142.	3156083	1-4Q18	12/10/2018	Milled Talc	OCB – Quarterly Monitoring Program	
143.	3156291	24218RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
144.	3156292	06618RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
145.	3156293	25518RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
146.	3156294	02318RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
147.	3156617	JBP003	09/11/2020	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample; Rosalino Reyes III and Gemma Reyes v. Johnson & Johnson et al.
148.	3156618	2014.001.3298	09/11/2020	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample; Rosalino Reyes III and Gemma Reyes v. Johnson & Johnson et al.
149.	3156687	1-1Q19	02/20/2019	Milled Talc	OCB – Quarterly Monitoring Program	
150.	3156998	A1901237-002A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
151.	3156999	A1901237-003A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
152.	3157000	A1901237-038A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
153.	3157001	A1901237-045A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
154.	3157002	A1901237-046A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
155.	3157003	A1901237-047A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
156.	3157004	A1901237-078A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
157.	3157005	A1901237-079A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
158.	3157006	A1901237-080A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
159.	3157046	27618RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
160.	3157047	0108RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
161.	3157048	02918RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
162.	3157049	28918RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
163.	3157139	A1901237-004A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
164.	3157140	A1901237-005A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
165.	3157141	A1901237-007A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
166.	3157142	A1901237-009A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
167.	3157143	A1901237-010A	06/04/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)
168.	3157144	A1901237-011A	06/03/2019	Milled Talc	Lit. – Produced by Imerys	Imerys Railcar Sample (MDL)

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ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
169.	3157186	29718RA	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
170.	3157187	31218RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
171.	3157188	31417RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
172.	3157189	25518RB	04/19/2019	Finished Good	Lit. – Produced by Defendants	Hermelinda Luna, Alexandra Hanks on behalf of Estate of Tania D. Hank, Ethel Herrera, et al. v. Johnson & Johnson, et al.
173.	3158521	1-2Q19	06/20/2019	Milled Talc	OCB – Quarterly Monitoring Program	
174.	3160639	U.K. Facility #1 20180061-73B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
175.	3160640	U.K. Facility #4 20180061-74B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
176.	3160641	U.K. Facility #3 20180061-72B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
177.	3160642	2015.001.3449B 20190189-02B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
178.	3160643	2014.001.5830B 20190189-01B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
179.	3160644	2019.001.0020B 20190189-04B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
180.	3160645	2019.001.0021B 20190189-05B	10/31/2019	Finished Good	Lit. – Produced by Defendants	MDL Historical Sample
181.	3160886	1-3Q19	09/23/2019	Milled Talc	OCB – Quarterly Monitoring Program	

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
182.	3161675	H06148-D7	10/28/2019	Milled Talc	OCB – Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
183.	3161678	H06158-D7	10/28/2019	Milled Talc	OCB – Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
184.	3161681	H05168-D7	10/28/2019	Milled Talc	OCB – Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
185.	3161684	H06228-D7	10/28/2019	Milled Talc	OCB – Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
186.	3161687	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
187.	3161809	21918RA	10/29/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB
188.	3161810	22118R	10/29/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB
189.	3161811	22218R	10/29/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB
190.	3161812	22518R	10/29/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB
191.	3161813	22618R	10/29/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB
192.	3161814	23018RA	10/29/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB
193.	3161879	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
194.	3161880	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
195.	3161881	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
196.	3161882	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
197.	3161883	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
198.	3161884	22318RB	10/28/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
199.	3161928	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
200.	3161929	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
201.	3161930	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
202.	3161931	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
203.	3161932	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
204.	3161933	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
205.	3161934	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
206.	3161935	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
207.	3161936	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
208.	3161937	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
209.	3161938	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
210.	3161939	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
211.	3161940	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
212.	3161941	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019

EXHIBIT A

ROW	LAB REF. NO.²	ADDITIONAL ID NO.³	DATE⁴	SAMPLE TYPE	CATEGORY⁵	OTHER INFORMATION
213.	3161942	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
214.	3161943	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
215.	3161944	22318RB	11/05/2019	Finished Good	OCB – Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
216.	3162528	1-4Q19	01/02/2020	Milled Talc	OCB – Quarterly Monitoring Program	
217.	3163161	1-1Q20	04/03/2020	Milled Talc	OCB – Quarterly Monitoring Program	
218.	3164535	1-2Q20	08/06/2020	Milled Talc	OCB – Quarterly Monitoring Program	
219.	3165105	1-3Q20	09/30/2020	Milled Talc	OCB – Quarterly Monitoring Program	

¹ All terms used herein shall have the same meaning as defined in the Second Supplement to the Agreed Order. This inventory identifies all samples of JBP, STS, or the talc used for those products, as well as all Deposit Samples, for which TEM grids were analyzed by RJLG for defendants in the ordinary course of their business, or for which TEM grids were analyzed by RJLG and relied on by defendants and/or their expert(s) in connection with Talcum Powder Litigation, except for those TEM grids that were analyzed and are relied upon solely in connection with an individual case. Defendants have made reasonable inquiries and have a reasonable and good faith belief that this inventory includes all TEM grids of JBP, STS, or the talc used for those products, as well as all TEM grids of Deposit Samples, that were analyzed by RJLG for defendants in connection with Talcum Powder Litigation except for certain (1) TEM grids created from samples received from plaintiffs or their experts during the period 2017 through the present and (2) TEM grids created from samples that have been made available to plaintiffs' counsel in Talcum Powder Litigation subsequent to the entry of the Agreed Order.

² Sample reference number assigned by RJLG.

³ Additional identifying information on sample containers and/or in testing reports prepared by experts in Talcum Powder Litigation.

⁴ Date of first RJLG report containing TEM analysis of sample.

⁵ As used herein, the categories referenced above shall be defined as follows:

-
- “Lit. – Produced by Defendants” – samples identified and produced to plaintiffs by defendants in Talcum Powder Litigation, including samples purchased and/or obtained by defense counsel and samples produced by defendants pursuant to the Agreed Order.
 - “Lit. – Produced by Plaintiffs” – samples identified and produced to defendants by plaintiffs in Talcum Powder Litigation, including samples purchased and/or obtained by plaintiffs’ counsel and samples allegedly used by individual plaintiffs.
 - “Lit. – Produced by Imerys” – samples produced by Imerys Talc America, Inc. pursuant to the Agreed Order and Stipulation Regarding Production of Talc Samples from Imerys Talc America Inc. (Dkt. No. 4757).
 - “Lit. – Miscellaneous” – samples tested in connection with litigation, but not covered by any other “Lit.” category.
 - “OCB – Quarterly Monitoring Program” – Grade 25 talc samples analyzed by RJLG for defendants in the ordinary course of their business in connection with defendants’ quarterly monitoring program.
 - “OCB – Voluntary Recall” – samples analyzed for defendants in the ordinary course of their business in connection with defendants’ October 18, 2019 voluntary recall of JBP Lot No. 22318RB.

EXHIBIT B

EXHIBIT B

Inventory of Samples for Which TEM Grids Were Created and Analyzed by Alan Segrave¹

ROW	LAB REF. NO.²	ADDITIONAL ID NO.	DATE³	SAMPLE TYPE	CATEGORY⁴	OTHER INFORMATION
1.	A1910246-001B	H06228-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
2.	A1910246-001C	H06228-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
3.	A1910246-001D	H06228-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
4.	A1910246-002B	H06148-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
5.	A1910246-002C	H06148-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
6.	A1910246-002D	H06148-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
7.	A1910246-003B	H05168-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
8.	A1910246-003C	H05168-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
9.	A1910246-003D	H05168-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
10.	A1910246-004B	22318RB	11/27/2019	Finished Good	OCB - Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019

EXHIBIT B

ROW	LAB REF. NO.²	ADDITIONAL ID NO.	DATE³	SAMPLE TYPE	CATEGORY⁴	OTHER INFORMATION
11.	A1910246-004C	22318RB	11/27/2019	Finished Good	OCB - Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
12.	A1910246-004D	22318RB	11/27/2019	Finished Good	OCB - Voluntary Recall	Lot of JBP that was voluntarily recalled on October 18, 2019
13.	A1910246-005B	H06158-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
14.	A1910246-005C	H06158-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB
15.	A1910246-005D	H06158-D7	11/27/2019	Milled Talc	OCB - Voluntary Recall	One of the lots of milled talc used for JBP Lot No. 22318RB

¹ All terms used herein shall have the same meaning as defined in the Second Supplement to the Agreed Order. This inventory identifies all samples of JBP, STS, or the talc used for those products, as well as all Deposit Samples, for which TEM grids were analyzed by Segrave for defendants in the ordinary course of their business, or for which TEM grids were analyzed by Segrave and relied on by defendants and/or their expert(s) in connection with Talcum Powder Litigation. Defendants have made reasonable inquiries and have a reasonable and good faith belief that Segrave does not possess any TEM grids of JBP, STS, or the talc used for those products, or any TEM grids of Deposit Samples, that were analyzed by Segrave for defendants in connection with Talcum Powder Litigation other than certain TEM grids created from samples that have been made available to plaintiffs' counsel in Talcum Powder Litigation subsequent to the entry of the Agreed Order.

² Sample reference number assigned by Segrave.

³ Date of first Segrave report containing TEM analysis of sample.

⁴ As used herein, "OCB - Voluntary Recall" shall refer to samples analyzed for defendants in the ordinary course of their business in connection with defendants' October 18, 2019 voluntary recall of JBP Lot No. 22318RB.

EXHIBIT C

EXHIBIT C

Chain of Custody Form

ITEM	LAB REF. NO.	ADDITIONAL ID NO.	DESCRIPTION
1			
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